

**Federal Republic of Nigeria**  
**Building Resilient Digital Infrastructure for**  
**Growth - BRIDGE**  
**(P508383)**

**ENVIRONMENTAL AND SOCIAL**  
**COMMITMENT PLAN (ESCP)**

**Appraisal Version**  
**June, 2025**

## **ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Federal Republic of Nigeria (the Recipient) will implement the Building Resilient Digital Infrastructure for Growth – BRIDGE Project (the Project), with the involvement of the Federal Ministry of Communication, Innovation and Digital Economy (FMCIDE) and a Project Company in the form of a Special Purpose Vehicle (SPV) set up by the Recipient, as set out in the Financing Agreement (the Agreement). The International Development Association (the Association), has agreed to provide the financing for the Project, as set out in the Agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the Agreement. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain throughout Project implementation a Project Implementation Unit (PIU) with qualified staff to support management of E&amp;S risks in sufficient numbers, including at least one (1) Environmental Specialist, one (1) Social Specialist, and one (1) GRM Specialist in the PIU and the SPV. Maintain the PIU as necessary throughout Project implementation period.</p>	<p>Establish an E&amp;S unit in the PIU not later than three (3) months after the Effective Date and thereafter maintain such unit throughout Project implementation.</p> <p>Maintain one (1) Environmental Specialist, one (1) Social Officer, and one (1) GRM Officer, in both the SPV and PIU throughout Project implementation.</p>	FMCIDE PIU
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>Ensure that the project workers, contractors, implementing agencies, and relevant stakeholders are trained in the following areas:</p> <ul style="list-style-type: none"> <li>a) Stakeholder mapping and engagement</li> <li>b) Implementation of Environmental and Social Management Framework (ESMF), Security Management Plan (SMP), Labor Management Procedure (LMP), Resettlement Action Plan and Resettlement Policy Framework (RPF)</li> <li>c) E&amp;S requirements of subprojects</li> <li>d) World Bank ESF</li> <li>e) Occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.</li> <li>f) Environmental and Social Risk Management procedures</li> <li>g) Effective GRM operation</li> <li>h) SEA/SH and Accountability and Response approach including Code of Conduct (CoC).</li> <li>i) Community health and safety) Communities (construction stage impacts, safety provisions, OHS guidelines)</li> </ul>	<p>Training will be started before commencement of the Project activities and will be implemented throughout the Project implementation.</p>	FMCIDE PIU
MONITORING AND REPORTING			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
C	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the ESCP, reports will present state of compliance with actions set out in the ESCP including environmental, social, health and safety (ESHS), performance of the project. These reports shall include:</p> <ul style="list-style-type: none"> <li>• Implementation of the Security Management Plan including any modification to scope of project intervention with potential for new E&amp;S risk.</li> <li>• Status of preparation and implementation of E&amp;S documents required under the ESCP.</li> <li>• Stakeholder engagement activities.</li> <li>• Functioning of the grievance mechanism(s) (the status of any complaints received).</li> <li>• E&amp;S performance of contractors and subcontractors as reported through [Quarterly] contractors' and supervision firms' reports.</li> <li>• Number and status of resolution of incidents and accidents reported under action E below.</li> <li>• including other aspects that the reporting would need to consider as relevant.</li> </ul>	Submit Quarterly reports to the Association no later than ten (10) days after the end of each reporting period.	FMCIDE PIU
D	<p><b>CONTRACTORS' QUARTERLY REPORTS</b></p> <p>Require contractors to submit Quarterly monitoring reports on implementation of ESMP, LMP, SMP, GRM, ESHS incidents &amp; supervision, Training conducted, and workers participation to the PIU. The PIU shall maintain a record of all such reports and would be submitted to the Association upon request.</p>	Quarterly reports shall be submitted to the PIU and to the Association upon request.	FMCIDE PIU / SPV
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Association of any incident or accident relating to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; forced or child labor; displacement without due process</p>	Notify the Association no later than 48 hours after learning of the incident or accident. Report to the Task Team Leader of the Association. Provide available	FMCIDE PIU / SPV

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>(forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than ten (10) days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS</b></p> <p>Adopt, disclose and implement the Environmental and Social Management Framework (ESMF) prepared for the Project, in a manner acceptable to the Association. The ESMF shall include a section on Labor Management Procedures, E-waste management, guidance regarding how to manage any negative impacts of tangible or intangible cultural heritage at project sites, and a social analysis that will identify key social inclusion and risk issues, and the impact on different stakeholders.</p> <p>If specific sites are identified, then site specific ESMPs would be prepared and implemented.</p>	Prior to commencement of any work and throughout Project implementation.	FMCIDE PIU
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents, the Code of Conduct / SEA /SH action plans and the Labor Management Procedures / OHS requirements and adequate remedies into the procurement documents for SPV, contracts of consultants and contractors. Thereafter ensure that the Contractors, supervising engineers and consultants comply with the ESHS specifications of their respective contracts.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors and consultants throughout Project implementation.</p>	FMCIDE PIU / SPV
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	FMCIDE PIU
1.6	<p><b>USE OF RECIPIENT'S ENVIRONMENTAL AND SOCIAL FRAMEWORK</b></p> <p>The Recipient's E&amp;S framework shall be utilized in part using the National Labour Law, Occupational</p>	Throughout Project implementation.	FMCIDE PIU / SPV

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Health and Safety Policy and the Waste Management systems.</p> <p>The Recipient shall promptly notify the Association of any changes to the E&amp;S policies, laws and regulations that may materially adversely affect the Recipient's ability to manage the E&amp;S risks and impacts of the Project in line with the ESSs and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the Association, such changes adversely affect relevant ESHS risk management aspects of the Project, the Recipient shall agree to implement measures and actions to address them in a manner acceptable to the Association. The ESCP shall be updated to reflect such agreed actions.</p>		
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Prepare and implement Labor Management Procedures (LMP) applicable to the entire Project as part of the ESMF, including, inter alia, provisions on working conditions, occupational, health and safety, code of conduct (which will include provisions for prevention of SEA/SH and GBV), no use of child or forced labor, workers grievance mechanism, and applicable requirements for primary suppliers (including other ESS2 requirements, such as adoption of a code of conduct, prevention of all forms of forced labor and child labor); and ensure that the labor management and working conditions of Project workers are consistent with this ESCP, the LMP, and with the Recipient's labor framework, namely, the National Labour Law.</p> <p>Promptly notify the Association of any changes to the Recipient's labor framework that may materially adversely affect the Recipient's ability to manage the labor risks and impacts of the Project in line with ESS2 and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the Association, such changes adversely affect relevant ESHS risk management aspects of the Project, the Recipient shall agree to implement measures and actions to address them in a manner acceptable to the Association. The ESCP shall be updated to reflect such agreed actions.</p> <p>Ensure that contractors implement the provisions of the LMP.</p>	<p>Develop LMP within sixty (60) days after the Effective Date.</p> <p>The LMP will be implemented throughout the project duration.</p> <p>Contractors / supervising engineers will adopt specific activities consistent with the LMP approved by PIU prior to start of work including adequate remedies.</p>	FMCIDE PIU
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b></p> <p>Prepare, adopt and implement occupational, health and safety (OHS) measures specified in the ESMFs; and ensure that the OHS measures under the Project are consistent with this ESCP, the ESMFs, and with the Recipient's occupational health and safety framework, namely, the National Policy on Occupational Health and Safety, and ensure that contractors implement the OHS measures.</p>	<p>OHS plan will be prepared and adopted prior to the commencement of construction activities and shall be implemented throughout the project duration by the contractor.</p>	FMCIDE PIU / SPV

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with the ESMF.</p> <p>Promptly notify the Association of any changes to the Recipient's occupational health and safety framework that may materially adversely affect the Recipient's ability to manage the OHS risks and impacts of the Project in line with ESS2 and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the Association, such changes adversely affect relevant ESHS risk management aspects of the Project, the Recipient shall agree to implement measures and actions to address them in a manner acceptable to the Association. The ESCP shall be updated to reflect such agreed actions.</p>	<p>Notify the Association immediately after taking notice of the change to the Recipient's occupational health and safety framework. Subsequent actions, if requested by the Association, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP</p>	
2.3	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2, and ensure that contractors provide GRM for their workers.</p>	<p>Prior to hiring project workers and maintained throughout Project implementation.</p>	FMCIDE PIU / SPV
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>Update, adopt, and implement the Recipient's subproject specific Waste Management Plan and e-Waste Management Plan as described in the ESMF and subsequent sub-project ESMPs, acceptable to the Association, to manage the waste that may be generated from the minor civil works following the protocol of reduce, reuse and recycle.</p> <p>Promptly notify the Association of any changes to the Recipient's WMP that may materially adversely affect the Recipient's ability to manage waste generated under the Project in line with ESS3 and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the Association, such changes adversely affect relevant ESHS risk management aspects of the Project, the Recipient shall agree to implement measures and actions to address them in a manner acceptable to the Association. The ESCP shall be updated to reflect such agreed actions.</p>	<p>Adopt the WMP prior to commencement of sub-project activities and thereafter implement the WMP throughout sub-project implementation</p> <p>Notify the Association immediately after taking notice of the change to the Recipient's WMP. Subsequent actions, if requested by the Association, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP.</p>	FMCIDE PIU / SPV
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Incorporate generic resource efficiency and pollution prevention and management measures in the ESMF to be prepared under Action 1.1 above and include in the respective sub-project specific ESMP where applicable.</p>	<p>As per 1.1., adopt as part of the ESMF. Inclusion in subproject specific ESMP throughout Project implementation</p>	FMCIDE PIU / SPV

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.	Same timeframe as for the preparation and implementation of the ESMP.	FMCIDE PIU / SPV
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association.	By commencement of works and maintained throughout Project implementation.	FMCIDE PIU / SPV
4.3	<b>SEA AND SH RISKS</b> Prepare, adopt and Implement a Code of Conduct for Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH) to mitigate the potential risk associated with SEA/SH.	Within sixty (60) days after the Effective Date and to be implemented throughout Project implementation.  Include approved GBV Action Plan in procurement documents / contract documents. To be implemented throughout project implementation.	FMCIDE PIU / SPV
4.4	<b>SECURITY MANAGEMENT</b>  Adopt and implement a Security Management Plan (SMP), in a manner acceptable to the Association. In implementing the security risk prevention and mitigation measures, the Recipient will be guided by the principles of proportionality and Good International Industry Practice (GIIP), and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of security personnel.  Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities [specify plans or include a reference to the instrument where such measures are reflected, as needed, e.g. as set out in the ESMP or Security Management Plan.  Include the SMP in the bidding documents of the contractors, and ensure the contractors comply with the requirements of SMP.	Prepare prior to commencement of Project activities including preparation of procurement documents; implement throughout the Project implementation  The SMP will be updated during implementation as needed	FMCIDE PIU / SPV
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	<p><b>RESETTLEMENT FRAMEWORK</b></p> <p>Upon identification of specific subproject site, develop site specific RAPs/ARAPs in line with the prepared RPF, consistent with this ESS and acceptable to the Association.</p> <p>Consult on, disclose and implement all RAPs/ARAPs prior to commencement of civil works in all sites under the project &amp; complete RAP implementation audit.</p> <p>Deposit funding allocated for the RAP implementation for each impact location in designated RAP account.</p> <p>Submit compensation and resettlement assistance payments completion report to and for the Association's clearance prior to commencing civil works at each impact site/location</p>	Prior to commencement of any civil works	FMCIDE PIU / SPV
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
Not relevant to this project			
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
Not relevant to this project			
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CULTURAL HERITAGE RISKS AND IMPACTS</b></p> <p>If sites or features are identified, then a cultural heritage management plan or plans would be prepared and implemented. All construction contracts will include a "Chance Find" clause which will require contractors to stop construction in the event that cultural property sites are encountered during construction.</p>	Before commencement of any civil works. and thereafter implement the CHMP throughout Project implementation.	FMCIDE PIU / SPV
8.2	<p><b>CHANCE FINDS</b></p> <p>Describe and implement the chance find procedures, as described in the ESMF of the Project and any other measures needed in accordance with ESS8; and as will be detailed in site specific ESMPs.</p>	Same timeframe as for the adoption and implementation of the ESMF. Implement the procedures throughout Project implementation.	FMCIDE PIU / SPV
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
Not Relevant to this Project			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN</b></p> <p>Develop and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p> <p>The Recipient will prepare an SEP budget commensurate to stakeholder engagement activities inclusive of, but not limited to, information disclosure, consultations, and the development and</p>	As per 1.1. above, prepare and adopt SEP with budget and implement the SEP throughout Project implementation.	FMCIDE PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	implementation of a project-level grievance redress mechanism.		
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	As per 1.1. above, prepare and adopt GRM, implement throughout Project implementation	FMCIDE PIU / SPV
<b>INDICATORS FOR IMPLEMENTATION READINESS</b> These may include actions related to:			
The following actions are indicators for implementation readiness: <ol style="list-style-type: none"> <li>1. Project-level GBV Action Plan and code of conduct will be prepared within sixty (60) days of Effective Date</li> <li>2. Draft SEP by Appraisal, Final SEP &amp; ESCP before decision meeting</li> <li>3. Security Risk Assessment and Security Management Plan before commencement of Project activities</li> <li>4. ESMF including LMP and Waste Management Plan – within sixty (60) days of Effective Date</li> <li>5. Establishment of E&amp;S risk management units in the PIU and SPV not later than three (3) months after the Effective Date.</li> <li>6. Recruitment and training of E&amp;S staff within the PIU and SPV.</li> </ol>			